

XA-6051P  
39)U.S. DEPARTMENT OF COMMERCE  
BUREAU OF EXPORT ADMINISTRATION

THIS SPACE FOR BXA USE

REPORT OF REQUEST FOR RESTRICTIVE TRADE PRACTICE OR BOYCOTT  
MULTIPLE TRANSACTIONS (Sheet No. 1)

(For reporting requests described in 769 of the Export Administration Regulations)

## NOTICE OF RIGHT TO PROTECT CERTAIN INFORMATION FROM DISCLOSURE.

The Export Administration Act permits you to protect from public disclosure information regarding the quantity, description, and value of the commodities or technical data supplied in Item 9 of this report and in any accompanying documents. **If you do not claim this protection, all of the information in your report and in accompanying documents will be made available for public inspection and copying.** You can obtain this protection by certifying, in Item 5 of the report, that disclosure of the information regarding the quantity, description and value of the commodities or technical data referred to above would place a United States company or individual involved in the report at a competitive disadvantage. If you make such a certification in Item 5, you may remove information regarding the quantity, description, and value of the commodities or technical data supplied by you from Item 9 of the public inspection copy of the report form and from the public inspection copies of the accompanying documents. The withholding of this information will be honored by the Department unless the Secretary determines that disclosure of the information would not place a United States company or individual at a competitive disadvantage or that it would be contrary to the national interest to withhold the information.

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This report is required by law (50 U.S.C. App. §2403-1a(b); P.L. 95-52; E.O. 12002; 15 CFR Part 769). Failure to report can result both in criminal penalties, including fines or imprisonment, and administrative sanctions.

**INSTRUCTIONS:** 1. This form may not include a transaction report that is filed late, nor indicate a decision on request other than those coded in Item 4 below. 2. This form may be used to report on behalf of another United States person if all transactions apply to the person identified in Item 2, but may not be considered as a dual report on behalf of both persons identified in Item 1a and Item 2. 3. Limit each report to 75 transactions or less. 4. Attach as many continuation sheets as needed. Enter sheet number and name of reporting firm on each continuation sheet (starting with Sheet No 2). 5. List each transaction across the continuation sheet, completing all items that apply. Use as many lines as necessary but separate transactions with a blank space or line. 6. Assemble original report form and accompanying documents as a unit, and submit intact and unaltered. 7. Assemble and submit the duplicate copy of report form (marked Duplicate (Public Inspection Copy)) and additional copies of accompanying documents (marked with the legend "Public Inspection Copy.") 4. If you certify, in Item 5, that the disclosure of the information specified there would cause competitive disadvantage, edit the "Public Inspection Copy" of the documents submitted to exclude the specified information and remove the right hand portion of the Duplicate (Public Inspection Copy) of the continuation sheet(s) relating to Column 9. **MULTIPLE TRANSACTIONS:** Public reporting for this collection of information is estimated to average one hour per reported request, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Office of Security and Management Support, Bureau of Export Administration, U.S. Department of Commerce, Washington, D.C. 20230; and to the Office of Management and Budget, Paperwork Reduction Project (0694-0012), Washington, D.C. 20503.

## 1a. Identify firm submitting this report:

Name: Sun Company, Inc. (R&M)  
Address: 1801 Market Street  
City, State and ZIP: Philadelphia, PA 19103  
Country (if other than USA):  
Telephone: (215) 977-6000  
Firm Identification No. (if known)

## Specify firm type:

- ☐ Exporter  
☐ Bank  
☐ Forwarder  
☐ Carrier  
☐ Insurer  
☒ Other

## 1b. Check any applicable box:

- ☐ Revision of a previous report (attach two copies of the previously submitted report)  
☐ Resubmission of a deficient report returned by BTR (attach form letter that was returned with deficient report)  
☒ Report on behalf of the person identified in item 2

## 2. If you are authorized to report and are reporting on behalf of another U.S. person, identify that person (e.g., domestic subsidiary, controlled foreign subsidiary, exporter, beneficiary):

Name:  
Address:  
City, State and ZIP:  
Country (if other than USA):  
Type of firm: (see list in item 1a)

## 3. REQUESTING DOCUMENT CODES (use to code Column 6 of continuation sheet)

- C Request to carrier for blacklist certificate (submit two copies of blacklist certificate or transcript of request)  
U Unwritten, not otherwise provided for (make transcript of request and submit two copies)  
L Letter of credit  
R Requisition/purchase order/accepted contract/ shipping instruction  
B Bid invitation/tender/proposal/trade opportunity  
Q Questionnaire (not related to a particular dollar value transaction)  
9 Other written

Submit two copies of each document or relevant page in which the request appears.

## 4. DECISION ON REQUEST CODES (use to code Column 7 of continuation sheet)

- R Have not taken and will not take the action requested  
T Have taken or will take the action requested

## 5. Protection of Certain Information from Disclosure: (Check appropriate boxes and sign Below)

☒ I (we) certify that disclosure to the public of the information regarding quantity, description, and value of the commodities or technical data contained in:

☒ Column 9 of the attached continuation sheets (If you check this box, be sure to remove column 9 from the Duplicate (Public Inspection Copy)) of the continuation sheets.

☒ Attached documents (If you check this box, be sure to edit the "Public Inspection Copy" of the documents submitted to exclude the specified information.) would place a United States person involved at a competitive disadvantage, and I (we) request that it be kept confidential

☐ I (we) authorize public release of all information contained in the report and in any attached documents.

I (we) certify that all statements and information contained in this report are true and correct to the best of my (our) knowledge and belief.

Sign here in ink

Type or print

Joseph D. Zulli

Date

July 31, 1998

MAY 1, 1998

FAX NUMBER:

ATTENTION:

RE:

SUN CONTRACT NUMBER - 306588

CC:

ATTENTION:  
FAX NUMBER:

BUYERS:  
PLEASE ADD:  
INVOICE AND/OR LOI TO BE ADDRESSED TO:  
ATTENTION:

FAX NUMBER:  
TELEX NUMBER:

DELIVERY: PLEASE ADD:

PERIOD:

PRICE: LAST PARAGRAPH:

PAYMENT:

FIRST PARAGRAPH: LAST LINE:

SUN:

QUOTE:

IT IS HEREBY AGREED THAT:

1. WE HEREBY WARRANT TO YOU THAT:

(A)

(B)

(C)

2.

(A)

(B)

3.

4.

5.

ENDQUOTE:

INSPECTION: FIRST LINE:

LAYTIME: PLEASE ADD:

DESTINATION: WE AGREE TO YOUR ADDITION. HOWEVER, WE PREFER TO  
REPLACE YOUR CLAUSE IN YOUR GENERAL PROVISIONS WITH THE  
FOLLOWING:

''BUYER ASSUMES FULL RESPONSIBILITY FOR ENSURING THIS OIL SHALL ONLY BE DISPOSED OF IN COMPLIANCE WITH THE LAWS AND POLICIES OF THE GOVERNMENT OF THE EXPORTING AND/OR PRODUCING COUNTRY. THE BUYER SHALL KEEP ITSELF INFORMED AS TO SUCH LAWS REGULATIONS, RULES AND GUIDELINES AND SHALL ENSURE THEY ARE COMPLIED WITH.''

LAW AND ARBITRATION: WE PREFER THE FOLLOWING:

PLEASE ADD THE FOLLOWING:

ALL NOTICES TO BE SENT TO THE FOLLOWING:

FAX NUMBER:

TELEX NUMBER:

OUR CONTACTS ARE AS FOLLOWS:

OPERATIONS:

CONTRACTS:

CREDIT:

BEST REGARDS,

Y:

CC:

Author: -  
Date: 4/6/98  
Priority:  
TO:  
Subject: REF:

ON YOUR TELEX NBR:

CONTRACT REFERENCE NUMBER:

SELLERS:

WC2R OZA

BUYERS:

QUALITY:

QUANTITY:

DELIVERY:

PERIOD:

PRICE:

(I)

(II)

PAYMENT:

W/E PAYMENT:

RISK AND TITLE:

INSPECTION---

DEMURPAGE:

DESTINATION RESTRICTION AND CERTIFICATION:  
AS PER APPLICABLE GENERAL TERMS AND CONDITIONS PLUS THE  
FOLLOWING:

NOTWITHSTANDING THE PROVISIONS OF THIS AGREEMENT,  
BUYERS SHALL NOT BE REQUIRED TO TAKE ANY ACTION OR REFRAIN  
FROM ANY ACTION IN ORDER TO COMPLY WITH CLAUSE 10 (OR  
APPLICABLE CLAUSE NUMBER) OF THE GENERAL TERMS AND  
CONDITIONS IF SUCH ACTION OR REFRAINING FROM SUCH ACTION  
WOULD BE PENALISED UNDER U.S. LAW OR REGULATION.

LAW AND ARBITRATION:

PRODUCT SAFETY DATA SHEET (PSDS)

OTHER TERMS:

TO READ AS FOLLOWS:

MAY 4, 1998

FAX NUMBER:

ATTENTION:

CC:

ATTENTION:  
FAX NUMBER:

RE:

SUN CONTRACT NUMBER - 306612

4. QUANTITY:

Y:

CC:



12. QUANTITY AND QUALITY:

13. LAYTIME AND DEMURRAGE:

14. WHERE NOT SPECIFICALLY COVERED BY THE ABOVE THIS CONTRACT  
SHALL BE SUBJECT TO NNPC GENERAL TERMS AND CONDITIONS LATEST  
EDITION.

15.

16. OPERATIONAL CONTACTS:

FOR ALL CONTRACTUAL MATTERS:

GENERAL CONDITIONS OF SALE OF  
NIGERIAN CRUDE OIL

PART II OF THE CONTRACTS

19.

19.

19.

20.

PARAGRAPH 21 - PROHIBITED DESTINATIONS

21. The BUYER shall have and is hereby given an irrevocable right to export the said Nigerian crude oil to any country except South Africa, Israel, Namibia (South-West Africa) and any other country not specifically named herein to which the export of Nigerian crude oil may be prohibited from time to time by the Nigerian Government in its absolute discretion.

JUNE 5, 1998

TELEX NUMBER:

ATTENTION:

RE:

CONTRACT NUMBER - 306631

REGARDS,

GENERAL CONDITIONS OF SALE OF  
NIGERIAN CRUDE OIL

PART II OF THE CONTRACTS

19.

19.

19.

20.

PARAGRAPH 21 - PROHIBITED DESTINATIONS

21. The BUYER shall have and is hereby given an irrevocable right to export the said Nigerian crude oil to any country except South Africa, Israel, Namibia (South-West Africa) and any other country not specifically named herein to which the export of Nigerian crude oil may be prohibited from time to time by the Nigerian Government in its absolute discretion.

Column

(2) Also enter firm identification number assigned to exporting firm, if known.  
(6) Use codes found on Sheet No. 1 to specify type(s) of document conveying the request.  
(7) Use codes found on Sheet No.1 to indicate whether action taken or not taken.  
(8) Enter reporting firm's reference number (e.g., letter of credit, customer order, invoice). This number must appear on corresponding copy of document or relevant page. Attach copies in same order as listed on continuation sheet(s).

SHEET NO. 2 of 4

REPORTING FIRM (Name)

Sun Company, Inc. (R&M)

FORM BXA-6051P-a (Rev. 10-89)

REPORT OF REQUEST FOR RESTRICTIVE TR

MULTIPLE TRANSACTIONS (Co

RSN SUBSET RTP/CLASS OTHER PARTY FIN  (1)	NAME AND ADDRESS OF EXPORTING FIRM INVOLVED <i>(unless same as item 1a or item 2 on Sheet No. 1)</i>  (2)	BOYCOTTING COUNTRY  (3)	BOYCOTTED COUNTRY OR COUNTRIES  (4)	DATE REQUEST RECEIVED BY FIRM <i>(month/day/year)</i>  (5)	REQUEST- ING DOCUMENT CODE  (6)	DECISION ON REQUEST CODE  (7)	YOUR REFERENCE NUMBER  (8)
<div>THIS SPACE FOR BXA USE</div> <div>REPORTABLE</div> <div>NOT REPORTABLE</div> <div>REPORTABLE</div> <div>NOT REPORTABLE</div> <div>REPORTABLE</div> <div>NOT REPORTABLE</div>	Reporting firm is not an exporting firm under these transactions	Gabon	South Africa Israel	4/3/98	R	T	306588
		Angola	None Specified	4/8/98	R	T	306594
		Angola	None Specified	4/15/98	R	T	306603
		Nigeria	South Africa Israel Namibia	4/15/98	R	T	306612
		Nigeria	None Specified	4/15/98	R	T	306614
		Nigeria	South Africa Israel Namibia	4/20/98	R	T q	306631
		Nigeria	None Specified	4/23/98	R	T	306654
		Angola	None Specified	4/27/98	R	T	306668
		Nigeria	None Specified	4/29/98	R	T	306670
		Nigeria	None Specified	5/4/98	R	T	306676
		Nigeria	None Specified	5/6/98	R	T	306682

- Column (2) Also enter firm identification number assigned to exporting firm, if known.  
 (6) Use codes found on Sheet No. 1 to specify type(s) of document conveying the request.  
 (7) Use codes found on Sheet No.1 to indicate whether action taken or not taken.  
 (8) Enter reporting firm's reference number (e.g., letter of credit, customer order, invoice). This number must appear on corresponding copy of document or relevant page. Attach copies in same order as listed on continuation sheet(s).



SHEET NO. 3 of 4

FORM BXA-6051P-a  
 (Rev. 10-89)

REPORTING FIRM (Name)

Sun Company, Inc. (R&M)

REPORT OF REQUEST FOR RESTRICTIVE TR  
 MULTIPLE TRANSACTIONS (Co

RSN SUBSET RTP/CLASS OTHER PARTY FIN  (1)	NAME AND ADDRESS OF EXPORTING FIRM INVOLVED (unless same as item 1a or item 2 on Sheet No. 1)  (2)	BOYCOTTING COUNTRY  (3)	BOYCOTTED COUNTRY OR COUNTRIES  (4)	DATE REQUEST RECEIVED BY FIRM (month/day/year)  (5)	REQUEST- ING DOCUMENT CODE  (6)	DECISION ON REQUEST CODE  (7)	YOUR REFERENCE NUMBER  (8)
THIS SPACE FOR BXA USE <b>NOT REPORTABLE</b>  <b>REPORTABLE</b> <b>NOT REPORTABLE</b> 	Reporting firm is not an export- ing firm under these transactions	Angola	None Specified	5/6/98	R	T	306683
		Nigeria	None Specified	5/14/98	R	T	306696
		Nigeria	None Specified	5/14/98	R	T	306597
		Angola	None Specified	5/14/98	R	T	306698
		Norway	None Specified	5/18/98	R	T	306710
		Nigeria	None Specified	5/15/98	R	T	306722
		Nigeria	South Africa Israel Namibia	5/20/98	R	T	306740
		Nigeria	None Specified	6/2/98	R	T	306759
		Angola	None Specified	6/8/98	R	T	306773
		Nigeria	None Specified	6/9/98	R	T	306775
		Nigeria	None Specified	6/11/98	R	T	306889

(Remove stub from public inspection copy at perforation if confidentiality is requested in Sheet No. 1)



JUNE 2, 1998

FAX NUMBER:

ATTN:

RE:

SUN CONTRACT NO. 306740  
ATTOCK REF:

2. BUYER  
INVOICE AND/OR LOI TO BE ADDRESSED TO:  
ATTENTION:

FAX NUMBER:  
TELEX NUMBER:

4. QUANTITY:

7. OTHER COSTS:

8. PAYMENT:

QUOTE:

GENERAL CONDITIONS OF SALE OF  
NIGERIAN CRUDE OIL

PART II OF THE CONTRACTS

19.


19.

19.

20.

PARAGRAPH 21 - PROHIBITED DESTINATIONS

21. The BUYER shall have and is hereby given an irrevocable right to export the said Nigerian crude oil to any country except South Africa, Israel, Namibia (South-West Africa) and any other country not specifically named herein to which the export of Nigerian crude oil may be prohibited from time to time by the Nigerian Government in its absolute discretion.

Column (2) Also enter firm identification number assigned to exporting firm, if known. (6) Use codes found on Sheet No. 1 to specify type(s) of document conveying the request. (7) Use codes found on Sheet No.1 to indicate whether action taken or not taken. (8) Enter reporting firm's reference number (e.g., letter of credit, customer order, invoice). This number must appear on corresponding copy of document or relevant page. Attach copies in same order as listed on continuation sheet(s).		SHEET NO. 4 of 4 REPORTING FIRM (Name) Sun Company, Inc. (R&M)		FORM BXA-6051P-a (Rev. 10-89) REPORT OF REQUEST FOR RESTRICTIVE TRADING MULTIPLE TRANSACTIONS (Continuation Sheet)				
RSN SUBSET RTP/CLASS OTHER PARTY FIN	NAME AND ADDRESS OF EXPORTING FIRM INVOLVED <i>(unless same as item 1a or item 2 on Sheet No. 1)</i>	BOYCOTTING COUNTRY	BOYCOTTED COUNTRY OR COUNTRIES	DATE REQUEST RECEIVED BY FIRM <i>(month/day/year)</i>	REQUEST- ING DOCUMENT CODE	DECISION ON REQUEST CODE	YOUR REFERENCE NUMBER	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
<b>NOT REPORTABLE</b> THIS SPACE FOR BXA USE 	Reporting firm is not an exporting firm under these transactions	DRC	None Specified	6/18/98	R	T	306808	
		Angola	None Specified					
		Angola	None Specified	6/18/98	R	T	306809	
		Nigeria	None Specified	6/23/98	R	T	306825	
		Gabone	None Specified	6/24/98	R	T	306843	
		U.K.	None Specified	6/29/98	R	T	306857	

(Remove stub from public inspection copy at perforation if confidentiality is requested in Sheet No. 1)